

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

TRACI L. JONES, )  
Plaintiff, )  
v. )  
FREEDOM RAIN, TLC and )  
BRENDA SPAHN, )  
Defendants. )

) CIVIL ACTION NUMBER:  
CV-08-CV-01599-KOB

## ANSWER

COME NOW Defendants Freedom Rain Ministries and Brenda Spahn in response to the Plaintiff's complaint and state:

1. Response to Paragraph 1: No response required.
2. Response to Paragraph 2: The Defendants admit that this Court has jurisdiction.
3. Response to Paragraph 3: The Defendants admit that venue is proper.
4. Response to Paragraph 4: Defendant Freedom Rain Ministries admits that the Plaintiff is its former employee. Defendant Spahn denies that the Plaintiff is her former employee.
5. Response to Paragraph 5: Denied.
6. Response to Paragraph 6: Defendant Freedom Rain Ministries is a non-profit corporation which operates the Lovelady Center, a Christian, faith-based

facility that houses, feeds and ministers to, *inter alia*, women recently released from prison and to their children. Denied.

7. Paragraph 7: Denied.
8. Response to Paragraph 8: Denied.
9. Response to Paragraph 9: The Defendants admit that Plaintiff is a former employee of Freedom Rain.
10. Response to Paragraph 10: The Defendants admit that Plaintiff is a former employee of Freedom Rain.
11. Response to Paragraph 11: Denied.
12. Response to Paragraph 12: Denied.
13. Response to Paragraph 13: Denied.
14. Response to Paragraph 14: Denied.
15. Response to Paragraph 15: Denied.
16. Response to Paragraph 16: Denied.
17. Response to Paragraph 17: Defendants admit that Defendant Freedom Rain is Christian, faith-based facility that encourages and all persons, including its employees and the women who live in its facility, to pray regularly.
18. Response to Paragraph 18: See response to Paragraph 17.
19. Response to Paragraph 19: Denied.
20. Response to Paragraph 20: Denied.

21. Response to Paragraph 21: Denied.
22. Response to Paragraph 22: Admitted.
23. Response to Paragraph 23: Denied.
24. Response to Paragraph 24: Denied.
25. Response to Paragraph 25: Denied.
26. Response to Paragraph 26: Denied.
27. Response to Paragraph 27: No response required.
28. Response to Paragraph 28: Denied.
29. Response to Paragraph 29: Denied.
30. Response to Paragraph 30: Denied.

Respectfully submitted,

s/ David R. Donaldson  
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Attorneys for the Defendants, Freedom Rain  
and Brenda Spahn

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of September, 2008, the foregoing document has been filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Thomas F. Talty  
Thomas Talty & Associates  
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Birmingham, AL 35203

s/ David R. Donaldson  
OF COUNSEL